

DATA REQUESTS

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

**FOCAL COMMUNICATIONS CORPORATION)
OF ILLINOIS)**

**Petition for Arbitration Pursuant to)
Section 252(b) of the Telecommunications) Docket No. 00-_____
Act of 1996 to Establish an Interconnection)
Agreement with Illinois Bell Telephone)
Company d/b/a Ameritech Illinois)**

**FOCAL COMMUNICATIONS CORPORATION OF ILLINOIS'
FIRST SET OF DATA REQUESTS TO
ILLINOIS BELL TELEPHONE COMPANY D/B/A AMERITECH ILLINOIS**

Focal Communications Corporation of Illinois ("Focal") hereby requests that Illinois Bell Telephone Company d/b/a Ameritech Illinois provide the data, information and documents described below.

DEFINITIONS AND INSTRUCTIONS

1. "Ameritech" refers to Illinois Bell Telephone Company d/b/a Ameritech Illinois unless otherwise indicated.
2. "CLEC" refers to any competitive local exchange carrier.
3. The word "similar" is intended to be as comprehensive as possible.
4. "Document" means any written, printed, typed or visually reproduced material of any kind, whether or not privileged, and includes but is not limited to the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, recordings, tapes, drawings, graphs, indexes,

charts, telephone records, photographs, phonographic records, computer files, other data compilation, or any other written, recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work, figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge or information.

5. "Due date" means Ameritech's confirmation date for order completion.

6. If you file a timely objection to any portion of a request, definition, or an instruction, provide a response to the remaining portion.

7. The terms defined above and the individual data requests should be construed broadly to the fullest extent of their meaning in a good faith effort to comply with the Illinois Supreme Court Rules.

8. As used in these requests, the singular shall also be treated as plural and vice-versa.

9. The responses should include the name of the person(s) providing the responses and the witness(es) who will be testifying on behalf of Ameritech who will be prepared to answer questions relating to such responses.

10. If any part of a document is responsive to any request, the whole document is to be produced.

11. Any alteration of a responsive document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document is a separate and distinct document and it must be produced.

12. If you are unable to produce a document in response to any request, so state, and indicate whether the document ever existed, or whether the document once existed but cannot be located. If any document once was, but is no longer in your possession, custody or control, state the whereabouts of any such document when last in your possession, custody or control, state the date and manner of its disposition and identify its last known custodian. To the extent any documents are lost or destroyed, produce any documents which support your assertion that the document was lost or destroyed, and provide the date thereof.

13. To the extent you claim any document described herein is privileged, or to the extent that you object to the production of any of the documents, please identify each and every document to which any claim of privilege or objection to production is asserted by stating in writing a general description of the document, its title, number of pages, date of preparation, person(s) who prepared the document, any person(s) who received or reviewed the document in original or other form, and the current custodian(s) of each such document, and state in writing the nature and basis for each claim of privilege or objection for each such document.

14. These data requests are continuing in nature and, thus, Ameritech is under a continuing duty to promptly supplement, correct or revise any response provided when the passage of time or change of circumstances would require a response to be supplemented, corrected or revised.

DATA REQUESTS

1. Describe with specificity the corporate relationship between Ameritech and Ameritech Information Industry Services ("AIIS").

2. With regard to the Ameritech and AIFS employees whose responsibilities involve meeting Ameritech's obligations under its Interconnection Agreement with Focal:

- a. How many people are assigned by Ameritech and AIFS to work the Focal account for purposes of meeting Ameritech's obligations under its Interconnection Agreement with Focal?
- b. Are any of these employees dedicated to the Focal account?
- c. How do Ameritech and AIFS determine the number of employees that are needed to perform under its Interconnection Agreement with Focal?
- d. How does this compare to other CLECs, i.e., do Ameritech and AIFS devote more or fewer employee resources to provisioning service to other CLECs?

3. With regard to the Ameritech and AIFS employees whose responsibilities involve providing facilities and services to Ameritech Advanced Data Services ("AADS"):

- a. How many employees are assigned by Ameritech and AIFS to provision facilities and services to AADS?
- b. Are any of these employees dedicated to providing facilities and services to AADS?
- c. How do Ameritech and AIFS determine the number of employees that are needed to provide facilities and services to AADS?
- d. How does this compare to other CLECs, i.e., do Ameritech and AIFS devote more or fewer employee resources to provisioning service to other CLECs?

4. Do Ameritech and AIFS ever assign employee resources to one CLEC or to AADS for a designated period of time? If yes, describe with specificity the circumstances

under which such assignment occurs and identify each such CLEC or whether the assignment was to service AADS.

5. What is the average number of business days from when a CLEC orders a T1 circuit to when it receives a Confirmation Due Date?

6. What is the average number of business days from when AADS orders a T1 circuit to when it receives a Confirmation Due Date?

7. What is the average number of business days from when Focal orders a T1 circuit to when it receives a Confirmation Due Date?

8. What is the average number of days between CLEC order submittal and the CLEC requested due date when a T1 circuit is ordered?

9. What is the average number of days between AADS order submittal and the AADS requested due date when a T1 circuit is ordered?

10. What is the average number of days after the CLEC requested order date that service is actually turned up when a T1 circuit is ordered?

11. What is the average number of days after the AADS requested order date that service is actually turned up when a T1 circuit is ordered?

12. What is the percentage of CLEC orders that are installed on the CLEC requested due date when a T1 circuit is ordered?

13. What is the percentage of AADS orders that are installed on the AADS requested due date when a T1 circuit is ordered?

14. What is the percentage of CLEC orders as to which the Confirmation Due Date was changed when a T1 circuit was ordered?

15. What is the percentage of AADS orders as to which the Confirmation Due Date was changed when a T1 circuit was ordered?

16. What is the percentage of Focal orders as to which the Confirmation Due Date is changed when a T1 circuit is ordered?

17. What is the percentage of CLEC orders as to which the Confirmation Due Date was changed more than once when a T1 circuit was ordered?

18. What is the percentage of AADS orders as to which the Confirmation Due Date was changed more than once when a T1 circuit was ordered?

19. What is the percentage of Focal orders as to which the Confirmation Due Date was changed more than once when a T1 circuit was ordered?

20. What is the average number of business days between when a T1 circuit is ordered and the T1 circuit is installed, when the circuit is being provided to a CLEC?

21. What is the average number of business days between when a T1 circuit is ordered and the circuit is installed, when the T1 circuit is being provided to AADS?

22. With regard to orders for circuits placed by AADS:

a. How many orders does AADS submit per month?

b. Provide the breakdown of these orders as to type of service, i.e., DS-0, DS-1, DS-3, OC-3, OC-12 and OC-48?

c. Does the speed at which circuits are provisioned vary by the type of circuit requested, i.e., DS-0, DS-1, DS-3, OC-3, OC-12 and OC-48? If yes, explain why and how there are such differences.

23. With regard to supplemental orders placed by AADS:

- a. What is the percentage of supplemental orders that AADS places per month?
 - b. What charges, if any, are assessed on AADS for placing supplemental orders? To the extent there are such charges, provide documentation that AADS is being billed these charges.
24. Describe with specificity the methodology used by AADS to access Ameritech's order entry systems.
25. Describe with specificity the methodology used by AADS to get access to Ameritech's facility database in order to determine loop length, bridge tap, wire gauge, etc.
26. Has AIIS ever made special arrangements for processing AADS service orders, i.e., to process orders for AADS in a manner different than it processes orders for CLECs? If yes, describe such arrangements in detail.
27. Explain the internal escalation procedure Ameritech uses when a customer requests a better or different Confirmation Due Date on an order.
28. What percentage of requests by a CLEC, AADS, Focal or business customers of Ameritech for a better or different Confirmation Due Date result in Ameritech changing the Confirmation Due Date?
29. What procedures do Ameritech and AIIS use for determining the availability of outside plant on orders placed by AADS, Focal, CLECs and business customers of Ameritech?
30. What percentage of orders by AADS, Focal, CLECs, business customers of Ameritech for T1s are referred internally by Ameritech or AIIS to Ameritech's engineering department?

31. What is the average number of days Ameritech's engineering department works on orders for AADS, Focal, CLEC and business customers of Ameritech, respectively?

32. Explain in detail how force and load affect provisioning intervals for T1s.

33. Provide copies of all documents received and originated by persons employed or retained by Ameritech or AIFS which address or relate to the issue of service provisioning intervals for AADS.

34. Provide copies of the most recent agreement pertaining to the exchange of traffic that Ameritech has with each incumbent local exchange carrier in the State of Illinois. Such agreements should be provided regardless of whether they were filed with the Illinois Commerce Commission and regardless of whether they have expired.

35. Does Ameritech pay any incumbent local exchange carrier reciprocal compensation for traffic involving ISPs? If yes, identify each such incumbent local exchange carrier and provide a copy of each such the agreement which sets forth this requirement.

36. Describe with specificity how Ameritech identifies whether traffic transported or terminated to an incumbent local exchange carrier is delivered to an ISP.

37. Provide copies of all documents received and originated by persons employed or retained by Ameritech which address or relate to the issue of reciprocal compensation for traffic involving ISPs.

38. Identify all Ameritech affiliates which provide ISP services in Illinois.

39. Provide copies of all documents which reflect, refer to or relate to Ameritech's measurement of telephone communications traffic billed as "Local Traffic."

40. Provide copies of all documents which reflect, refer to or relate to the measurement of traffic originating on Ameritech's network and destined to ISPs on a CLEC network.

41. Provide copies of all documents prepared by Ameritech or at the direction of Ameritech which describe how Ameritech distinguishes or differentiates between calls to ISP customers of CLECs and other local or business calls.

42. Provide copies of all documents prepared by Ameritech or at the direction of Ameritech which describe how Ameritech distinguishes or differentiates between calls to ISP customers of Ameritech and other local or business calls (whether or not such calls are originated on Ameritech's or a CLEC's network).

43. Provide copies of all workpapers, notes, spreadsheets or other documents utilized by Ameritech in estimating the percentage of reciprocal compensation which Ameritech has concluded was for calls destined to ISPs on Focal's network.

44. Provide copies of all workpapers, notes, spreadsheets or other documents utilized by Ameritech in estimating the percentage of reciprocal compensation which Ameritech has concluded was for calls originated on Focal's network and destined for ISPs on Ameritech's network.

45. Does Ameritech rate and bill its retail customers for local calls pursuant to the terms of the Ameritech local exchange tariff when such customers place calls to a telephone number used by an ISP within the Ameritech customer's local calling area, regardless of which local service carrier provides the service to the ISP? If the answer is no, explain why not.

46. When an Ameritech end user calls an ISP in the end user's local calling area:

- a. Does Ameritech charge the end user for the call pursuant to Ameritech's local exchange tariff? If not, what charges are imposed?
- b. Does Ameritech book the call to a local revenue account? If no, to what account is the call booked?
- c. Does Ameritech allocate the associated cost to the local/intrastate jurisdiction? If not, to what jurisdiction is the cost allocated?
- d. Does Ameritech report the revenues and costs as local for ARMIS reporting purposes?

47. Does Ameritech require its local service customers to declare whether they provide or intend to provide dial-up ISP service?

[For purposes of the following five items, the term "Primary Line" is defined as an access line that would today be charged the single line, end user common line charge, and the term "Multi-Line" is defined as any access line that would today be charged a multi-line, end user subscriber line charge.]

48. Provide the number of access lines (on a DSO equivalent basis) broken down as described below that Ameritech served as of January 1, 1996:

- a. Primary Residential Access Lines;
- b. Primary Business Access Lines;
- c. Residential Multi-Lines;
- d. Business Multi-Lines; and
- e. ISDN Primary Rate Interface lines.

49. Provide the number of access lines (on a DSO equivalent basis) broken down as described below that Ameritech served as of January 1, 1997:

- a. Primary Residential Access Lines;
- b. Primary Business Access Lines;
- c. Residential Multi-Lines;
- d. Business Multi-Lines; and
- e. ISDN Primary Rate Interface lines.

50. Provide the number of access lines (on a DSO equivalent basis) broken down as described below that Ameritech served as of January 1, 1998:

- a. Primary Residential Access Lines;
- b. Primary Business Access Lines;
- c. Residential Multi-Lines;
- d. Business Multi-Lines; and
- e. ISDN Primary Rate Interface lines.

51. Provide the number of access lines (on a DSO equivalent basis) broken down as described below that Ameritech served as of January 1, 1999:

- a. Primary Residential Access Lines;
- b. Primary Business Access Lines;
- c. Residential Multi-Lines;
- d. Business Multi-Lines; and
- e. ISDN Primary Rate Interface lines.

52. Provide the number of access lines (on a DSO equivalent basis) broken down as described below that Ameritech served as of January 1, 2000:

- a. Primary Residential Access Lines;
- b. Primary Business Access Lines;

- c. Residential Multi-Lines;
- d. Business Multi-Lines; and
- e. ISDN Primary Rate Interface lines.

53. Provide the average monthly revenue Ameritech received from an Ameritech residential customer in each of the following years: 1996, 1997, 1998 and 1999. A complete answer should incorporate revenues from local exchange service, intraLATA toll services, vertical features, switched access services, and any other service that was included on a residential customers' local bill from Ameritech during each of those years. Separately identify the average revenue received from each of these types of services (and any others for which Ameritech maintains records) for each year.

54. Identify the average per-minute-of-use costs Ameritech incurs when Focal (or any other CLEC) delivers a call to an Ameritech tandem that must ultimately be transferred to an Ameritech-served Internet Service Provider served via another end office (i.e., not the same serving wire center as the tandem). *Assume the call in question is equal in duration to an average local voice call.* Identify any tandem related costs (or cost elements), transport related costs (or cost elements) and end office switching related costs (or cost elements) separately before summing to arrive at a composite, average per-minute-of-use cost. If a cost model is used to provide information relevant to this response, provide the name and version of any cost model used. In addition, state the costs for the calling scenario in terms of the rate elements approved by the Illinois Commerce Commission in its most recent TELRIC investigation. If the TELRIC-based answer differs in any respect from Ameritech's primary response to this request, quantify the difference. In addition, explain why, in Ameritech's view, the Commission's TELRIC-

based costs are not the appropriate measure of the cost to deliver the call as described in this request.

55. Identify the average per-minute-of-use costs Ameritech incurs when Focal (or any other CLEC) delivers a call to an Ameritech tandem that must ultimately be transferred to an Ameritech-served Internet Service Provider served via another end office (i.e., not the same serving wire center as the tandem). *Assume the call in question is 10 minutes in duration.* Identify any tandem related costs (or cost elements), transport related costs (or cost elements) and end office switching related costs (or cost elements) separately before summing to arrive at a composite, average per-minute-of-use cost. If a cost model is used to provide information relevant to this response, provide the name and version of any cost model used. In addition, state the costs for the calling scenario in terms of the rate elements approved by the Illinois Commerce Commission in its most recent TELRIC investigation. If the TELRIC-based answer differs in any respect from Ameritech's primary response to this request, quantify the difference. In addition, please explain why, in Ameritech's view, the Commission's TELRIC-based costs are not the appropriate measure of the cost to deliver the call as described in this request.

56. Identify the average per-minute-of-use costs Ameritech incurs when Focal (or any other CLEC) delivers a call to an Ameritech tandem that must ultimately be transferred to an Ameritech-served Internet Service Provider served via another end office (i.e., not the same serving wire center as the tandem). *Assume the call in question is 15 minutes in duration.* Please identify any tandem related costs (or cost elements), transport related costs (or cost elements) and end office switching related costs (or cost elements) separately before summing to arrive at a composite, average per-minute-of-use cost. If

a cost model is used to provide information relevant to this response, please provide the name and version of any cost model used. In addition, state the costs for the calling scenario in terms of the rate elements approved by the Illinois Commerce Commission in its most recent TELRIC investigation. If the TELRIC-based answer differs in any respect from Ameritech's primary response to this request, quantify the difference. In addition, explain why, in Ameritech's view, the Commission's TELRIC-based costs are not the appropriate measure of the cost to deliver the call as described in this request.

57. Identify the average per-minute-of-use costs Ameritech incurs when Focal (or any other CLEC) delivers a call to an Ameritech tandem that must ultimately be transferred to an Ameritech-served Internet Service Provider served via another end office (i.e., not the same serving wire center as the tandem). *Assume the call in question is 20 minutes in duration.* Please identify any tandem related costs (or cost elements), transport related costs (or cost elements) and end office switching related costs (or cost elements) separately before summing to arrive at a composite, average per-minute-of-use cost. If a cost model is used to provide information relevant to this response, please provide the name and version of any cost model used. In addition, state the costs for the calling scenario in terms of the rate elements approved by the Illinois Commerce Commission in its most recent TELRIC investigation. If the TELRIC-based answer differs in any respect from Ameritech's primary response to this request, quantify the difference. In addition, explain why, in Ameritech's view, the Commission's TELRIC-based costs are not the appropriate measure of the cost to deliver the call as described in this request.

58. Identify the average per-minute-of-use costs Ameritech incurs when Focal (or any other CLEC) delivers a call to an Ameritech tandem that must ultimately be

transferred to an Ameritech-served Internet Service Provider served via another end office (i.e., not the same serving wire center as the tandem). *Assume the call in question is 25 minutes in duration.* Please identify any tandem related costs (or cost elements), transport related costs (or cost elements) and end office switching related costs (or cost elements) separately before summing to arrive at a composite, average per-minute-of-use cost. If a cost model is used to provide information relevant to this response, please provide the name and version of any cost model used. In addition, state the costs for the calling scenario in terms of the rate elements approved by the Illinois Commerce Commission in its most recent TELRIC investigation. If the TELRIC-based answer differs in any respect from Ameritech's primary response to this request, quantify the difference. In addition, explain why, in Ameritech's view, the Commission's TELRIC-based costs are not the appropriate measure of the cost to deliver the call as described in this request.

59. Please provide the duration (in minutes) of an average local call on the Ameritech network. For purposes of this question, remove from the average any call bound for an Internet Service Provider. Please identify the timeframe from which the data used to answer this question was taken (by year).

60. Please provide the duration (in minutes) of an average local call on the Ameritech network. For purposes of this question, assume that calls bound for an Internet Service Provider are "local calls" and include those calls in the analysis when deriving the average duration. Please identify the timeframe from which the data used to answer this question was taken (by year).

61. Please provide the duration (in minutes) of an average call originating on the Ameritech network and ultimately carried to an Internet Service Provider (whether that ISP

be served by Ameritech or another carrier). Please identify the timeframe from which the data used to answer this question was taken (by year).

62. Please provide the following information as to Ameritech's Internet Service Provider (Ameritech.net) separately for each of the years 1996 through 1999:

- a. Total Revenue;
- b. Net Income;
- c. Return on Investment;
- d. Return on Equity;
- e. Number of subscribers;
- f. Average duration of client session; and
- g. Total payments made from Ameritech.net to any other Ameritech subsidiary.

For purposes of this question, payment means any consideration, including but not limited to money, assets, and equipment.

63. Describe the corporate relationship that exists between Ameritech and Ameritech.net. Provide a diagram depicting the hierarchy of ownership that exists between the two companies and their respective parents, ultimately identifying SBC Communications as the ultimate corporate parent if indeed SBC Communications is the ultimate corporate parent of both organizations.

64. Does Ameritech.net purchase services, facilities or any other products from Ameritech. If yes, please identify each of those services, facilities or products separately and identify the price or other consideration that Ameritech.net pays for those services, facilities or products. Also, provide copies of all agreements under which such services, facilities or products are provided.